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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE: INCRETIN-BASED
THERAPIES PRODUCTS
LIABILITY LITIGATION**

Relates to: ALL CASES

MDL No. 13-md-2452-AJB(MDD)

**NOTICE OF MOTION AND
MOTION TO COMPEL AGAINST
ALL DEFENDANTS FOR THEIR
ANALYSIS OF A CAUSAL
ASSOCIATION**

**No oral argument per Chambers
request**

Case No. 13-md-02452-AJB-MDD

NOTICE OF MOTION AND MOTION TO COMPEL AGAINST ALL DEFENDANTS
FOR THEIR ANALYSIS OF A CAUSAL ASSOCIATION

1 **TO DEFENDANTS AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiffs hereby move the Honorable Anthony
3 J. Battaglia, Courtroom 3B, Edward J. Schwarz Courthouse, 221 West Broadway, San
4 Diego, California 92101, for an Order compelling each Defendant to provide
5 meaningful supplemental responses to interrogatories and requests for production
6 regarding Defendants' criteria and analyses for assessing a causal relationship
7 between their drugs and pancreatic cancer. The specific requests at issue are
8 Interrogatory Nos. 25 and 26, and Document Request Nos. 43, 44, 45, 46, 47, 50, 52,
9 57 and 58.

10 This motion is brought pursuant to Fed. R. Civ. P. 26(g), 33, 34, and
11 37(a)(3)(B). The motion is supported by a Memorandum of Points and Authorities
12 and its exhibit reciting verbatim the requests and responses at issue. Plaintiffs certify
13 that they have in good faith conferred with each Defendant in an effort to obtain the
14 discovery without court action, but were unsuccessful as further described in the
15 Memorandum.

16
17 DATED: August 29, 2014

PLAINTIFFS' COUNSEL

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19 s/ Michael K. Johnson

20 Michael K. Johnson

21 Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2014, I caused the above document to be filed via the CM/ECF system for the Southern District of California, and the CM/ECF system served the same upon all registered users at their registered email addresses.

s/Michael K. Johnson

Michael K. Johnson
Attorney for Plaintiffs